

### **Remarks**

The Applicants have amended Claim 23 to incorporate the subject matter of Claim 26. Claim 26 has accordingly been cancelled. Claim 32 has also been cancelled inasmuch as it depends on now cancelled Claim 26.

This Response is submitted together with a Request for Continued Examination. Although this Response and the claim amendments set forth above do not raise any new issues for consideration inasmuch as Claims 23 and 26 have already been examined, the Applicants nonetheless submit the above-mentioned RCE to remove any doubt as to the entry of the above changes into the official file and prompt allowance of the application.

Claims 23-25, 27-31 and 33 stand rejected under 35 USC §102 as being anticipated by JP ‘211. The Applicants respectfully submit that the rejection is now moot in view of the incorporation of the subject matter of Claim 26 into Claim 23. Withdrawal of the rejection is respectfully requested.

Claims 26, 32 and 34 stand rejected under 35 USC §103 over the combination of Okamura, Shigeta or EP ‘075 with JP ‘211. The Applicants respectfully submit that even if one skilled in the art were to hypothetically combine any or all of Okamura, Shigeta and EP ‘075 with JP ‘211, the films resulting from that combination would still be quite different from those recited in independent Claim 23 (which is now relevant given the inclusion of the subject matter of Claim 26 into Claim 23) Details follow.

The rejection states on page 3, lines 11-15 that JP ‘211 teaches that a known organic additive compound and inorganic particle filler additive can be added to the polymer acid solution for the improved adhesion surface treatment layer as disclosed in paragraphs [0016] and [0020]. The rejection thus concludes that these additives read upon the broadly claimed “heat-

resistant surface treatment agent.” Importantly, the rejection further notes that the term replaced by asterisks in paragraph [0016] appears to be an organic “coupling” compound.

However, at the very least, the latter point is incorrect. The Applicants have referred to the original Japanese language version of JP ‘211 and discovered that the translation of JP 2000-043211A (JP ‘211), paragraph [0016], lines 8-9 is insufficient in the phrase “An organic \*\*\*\* compound.” The term “\*\*\*\*” should read “phosphorous” in view of the original Japanese description. Thus, the phrase “An organic \*\*\*\* compound” in the translation should correctly read “An organic phosphorous compound.”

The Applicants therefore respectfully submit that JP ‘211 is silent concerning the use of the heat-resistant surface treatment agent which is an aminosilane compound, an epoxysilane compound or a titanate compound as specified in Claim 23.

Moreover, the Applicants respectfully submit that given the teachings of JP ‘211 with respect to an organic phosphorous compound, the Applicants’ utilization of an aminosilane, an epoxysilane or a titanate, is anything but obvious over the organic phosphorous compound of JP ‘211. Hence, JP ‘211 is completely inapplicable.

The Applicants respectfully submit, however, that all of Okamura, Shigeta and EP ‘075 fail to cure this deficiency. Utilizing those three secondary references for the purposes set forth in the rejection, would still not result in a film wherein the heat resistance surface treatment agent comprises an aminosilane compound, an epoxysilane compound or a titanate compound. That resulting film would, at most, contain a heat resistant surface treatment agent which is an organic phosphorus compound. Such an organic phosphorus compound is completely different from the Applicants’ claimed aminosilane, epoxysilane or a titanate compounds. Thus, the

combination still does not result in the Applicants' claimed film. Withdrawal of the rejection is respectfully requested.

In light of the foregoing, the Applicants respectfully submit that the entire application is now in condition for allowance, which is respectfully requested.

Respectfully submitted,

A handwritten signature in black ink, appearing to be 'TDC' with a stylized flourish.

T. Daniel Christenbury  
Reg. No. 31,750  
Attorneys for Applicants

TDC/vp  
(215) 656-3381